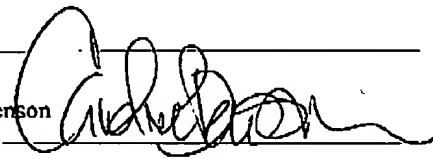
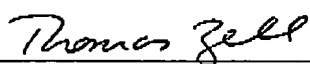


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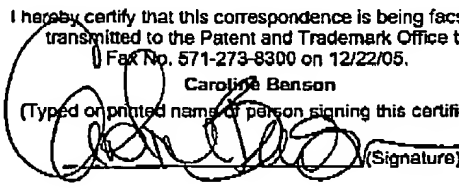
PRE-APPEAL BRIEF REQUEST FOR REVIEW	
CERTIFICATE OF TRANSMISSION I hereby certify that this correspondence is being facsimile transmitted to the Patent and Trademark Office Fax No. (703) 305-8568 on <u>12/22/2005</u> Signature <u></u> Typed or printed name <u>Caroline Benson</u>	
Docker Number (Optional) A1320Q-US-NP	
Application Number 09/683,239	Filed December 5, 2001
First Named Inventor Gregory T. Grefenstette	
Art Unit: 2178	Examiner Joshua D. Campbell
Customer Number: 25453	
Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.	
This request is being filed with a notice of appeal.	
The review is requested for the reason(s) stated on the attach sheet(s). Note: No more than five (5) pages may be provided.	
I am the <input checked="" type="checkbox"/> Attorney or Agent of record. Registration number 37,481 <input type="checkbox"/> attorney or agent acting under 37 CFR 1.34 Registration number if acting under 37 CFR 1.34.	
<u></u> Signature Thomas Zell Typed or Printed name 650-812-4281 Telephone Number 12/16/2005 Date	
<input checked="" type="checkbox"/> Total of <u>1</u> forms are submitted. 305-8568	

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<p style="text-align: center;">CERTIFICATE OF TRANSMISSION</p> <p>I hereby certify that this correspondence is being facsimile transmitted to the Patent and Trademark Office to Fax No. 571-273-8300 on 12/22/05.</p> <p style="text-align: center;">Caroline Benson (Typed or printed name of person signing this certificate)</p> <p style="text-align: center;"> (Signature)</p>

Application No. : 09/683,239
Filed : 12/05/2001
Inventor(s) : Gregory T. Grefenstette et al.
Docket No. : A1320Q-US-NP
Confirmation No. : 8312
Examiner : Joshua D. Campbell
Art Unit : 2178
Title : META-DOCUMENT MANAGEMENT SYSTEM WITH
DOCUMENT IDENTIFIERS
Customer No. : 25453

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Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Sir:

Applicant respectfully requests a pre-appeal review of this application, which was finally rejected in an Office Action dated September 22, 2005 and for which a Response And Request For Reconsideration was filed November 22, 2005, and in response to which an Advisory Action was mailed December 2, 2005. Cross-reference is made to U.S. Patent Application Serial No. 09/683,240 for which a Pre-Appeal Brief Request For Review is being simultaneously filed on similar grounds.

The Office Action rejects claims 1-7 and 9-20 under 35 USC 103(a) as being unpatentable over Horowitz et al., U.S. Patent 6,122,647 (hereinafter "Horowitz") in view of Goodisman et al., U.S. Patent Application Publication 2002/0069223, filed October 3, 2001 (hereinafter "Goodisman 2001") and rejects claim 8 under 35 USC 103(a) as being unpatentable over Horowitz in view of *Goodisman 2001* as applied to claim 1, and further in view of Keith JR, U.S. Patent Application Publication

Application No. 09/683,239

2002/0032672.

Goodisman 2001 claims priority to Provisional Patent Application Serial No. 60/249498, filed November 17, 2000 (hereinafter "*Goodisman 2000*" or "*Goodisman Provisional*").

The Office Action relies on paragraphs 0025-0026 of *Goodisman 2001*, which paragraphs are not disclosed in *Goodisman 2000*, in rejecting Applicant's claims (see Office Action on: page 3, lines 5-6; page 4, line 4; page 5, lines 4, and 11; page 6, line 19; page 7, lines 4 and 19).

In view of the non-disclosure of paragraphs 0025-0026 in *Goodisman 2000*, Applicant respectfully submits that paragraphs 0025-0026 disclosed in *Goodisman 2001* filed October 3, 2001 may not be relied on as prior art under 35 USC 103(a) in rejecting Applicant's invention, because Applicant's claimed invention is entitled to a priority date of August 13, 2001.

Also, if as maintained in the Advisory Action on page 2, line 2 that "the information relied upon in [*Goodisman 2001*] is indeed indicated in [*Goodisman 2000*]", then those sections of *Goodisman 2000* should be cited in rejecting Applicant's invention in lieu of paragraphs 0025-0026 of *Goodisman 2001*, which are not disclosed in *Goodisman 2000*.

Applicant therefore respectfully requests in view of the forgoing that the final rejection of claims 1-20 be withdrawn and restated to not rely on portions of *Goodisman 2001* which were not disclosed in *Goodisman 2000*.

Furthermore, Applicant respectfully submits that claims 1-20 are allowable for the reasons set forth in section 1.B of the Response And Request For Reconsideration, which sets forth starting on page 4 the following:

[] Applicant's invention recited in Independent claim 1 sets forth a method for enriching content of a document by associating a personality identifier (where a personality identifies an enrichment theme) with a reading device (e.g., an electronic tag reader). The reading device associates a recorded document identifier with the personality identifier of the reading device before transmitting both to a meta-document server for enrichment to be performed

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according to the enrichment theme of the personality identified by the personality identifier. More specifically, the cited sections of Horowitz and Goodisman Provisional fail to disclose or suggest the *association of a personality identifier with a reading device and the association of a document identifier (recorded with the reading device) with the personality identifier*, wherein the document identifier and the personality identifier are transmitted to a meta-document server that recognizes and annotates entities in the electronic document related to the enrichment theme of the personality identified by the personality identifier. Instead, Goodisman Provisional discloses location services [] that read singly or together with the contextual creation of hyperlinks disclosed in Horowitz [], fail to disclose or suggest the recognition and annotation of entities in electronic document content identified by a recorded document identifier, as claimed by Applicant, where a personality identifier is associated with a reading device and a document identifier once recorded by the reading device is associated with the personality.

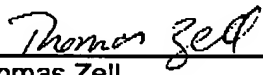
Also unlike Horowitz taken singly or together with Goodisman Provisional, Applicant's invention recited in independent claims 9 and 12 sets forth a method for *enriching content of a document selected at a mobile computing device* by identifying position coordinates of the mobile computing device *where the document content is selected*, and thereafter looking up a personality identifier using the position coordinates, at the mobile computing device (claim 9) or at a meta-document server (claim 12), before enriching the document content according to the enrichment theme of the personality identified by the personality identifier. Instead, the location services disclosed in Goodisman Provisional describe, for example, probabilistic location determination for determining where a user actually is and profile creation based on location tracking. Such disclosed location services in Goodisman Provisional taken singly or together with

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Horowitz fail to disclose or suggest Applicant's claimed invention which recites the *identification of position coordinates of a mobile computing device where electronic document content is referenced and thereafter enriching the electronic document content with a personality identifying enrichment themes that is looked up using the position coordinates.*

Accordingly, for the reasons stated above, Applicant respectfully requests a pre-appeal review to reopen prosecution.

Respectfully submitted,



Thomas Zell
Attorney for Applicant(s)
Registration No. 37,481
Telephone: 650-812-4281
Date: 12/16/05